

TECHNICAL BASIS FOR TIER I OPERATING PERMIT

DATE: December 9, 2002

PERMIT WRITER: Steve Coe

PERMIT COORDINATOR: Bill Rogers

SUBJECT: AIRS Facility No. 011-00020, Basic American Foods, Shelley
Final Tier I Operating Permit

Permittee:	Basic American Foods
Permit Number:	011-00020
Air Quality Control Region:	61
AIRS Facility Classification:	A
Standard Industrial Classification:	2034
Zone:	12
UTM Coordinates:	409.0, 4803.5
Facility Mailing Address:	434 S. Emerson Avenue, Shelley, ID 83274
County:	Bingham
Facility Contact Name and Title:	Chad Eberhard, Plant Manager
Contact Name Phone Number:	(208) 357-3402
Responsible Official Name and Title:	Larry Sautter, Environmental Manager
Exact plant Location:	434 S. Emerson Avenue, Shelley, Idaho
General Nature of Business & Kinds of Products:	Potato processing and packaging.

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LIST OF ACRONYMS, UNITS, AND, CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
BAF	Basic American Foods Inc.
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAP	hazardous air pollutants
Hg	mercury
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
MACT	Maximum Available Control Technology
MMBtu	million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter of 10 micrometers or less
PSD	Prevention of Significant Deterioration
PTC	permit to construct
SIP	State Implementation Plan
SO ₂	sulfur dioxide
T/yr	tons per year
VOC	volatile organic compound

PUBLIC COMMENT/AFFECTED STATES/EPA REVIEW SUMMARY

A 30-day public comment period for the Basic American Foods facility in Shelley draft Tier I operating permit was held as required by IDAPA 58.01.01.364, *Rules for the Control of Air Pollution in Idaho*. The comment period ran from October 9 through November 7, 2002. A public hearing was held November 7. No comments were received from any entity.

IDAPA 58.01.01.008.01, defines *affected states* as: "*All states: whose air quality may be affected by the emissions of the Tier I source and that are contiguous to Idaho; or that are within fifty (50) miles of the Tier I source.*"

A review of the site location information included in the permit application indicates that the facility is not located within 50 miles of a state border.

A proposed permit was developed and forwarded to the EPA Region 10 for their 45-day review as required by IDAPA 58.01.01.366. The EPA provided no written objection to the permit.

1. **PURPOSE**

The purpose of this memorandum is to explain the legal and factual basis for this draft Tier I operating permit in accordance with IDAPA 58.01.01.362, *Rules for the Control of Air Pollution in Idaho*.

The DEQ has reviewed the information provided by BAF regarding the operation of their facility located in Shelley. This information was submitted based on the requirements to submit a Tier I operating permit in accordance with IDAPA 58.01.01.300.

2. **SUMMARY OF EVENTS**

On June 16, 1995, DEQ received a Tier I operating permit application from Pillsbury for their potato processing facility in Shelley. On December 31, 1998, the facility was sold to BAF. On August 18, 1999, DEQ received a Tier I operating permit application from BAF for the Shelley facility. Kennedy/Jenks Consultants prepared the application.

A public comment period was provided from October 9 through November 7, 2002. No comments were received from any entity. A proposed permit was developed and forwarded to EPA for their review as required by IDAPA 58.01.01.366. The EPA provided no written objection to the permit.

3. **BASIS OF THE ANALYSIS**

The following documents were relied upon in preparing this memorandum and the Tier I operating permit:

- The Pillsbury Tier I operating permit application, received June 16, 1995 and the BAF Tier I operating permit application received August 18, 1999.
- PTC No. 0140-0020 issued March 20, 1990.
- PTC No. 020-00020 issued September 10, 2001.
- Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, January 1995, Office of Air Quality Planning and Standards, United States Environmental Protection Agency.
- Guidance developed by the EPA and DEQ.
- Title V permits issued by other jurisdictions.

4. **FACILITY DESCRIPTION**

4.1 **GENERAL PROCESS DESCRIPTION**

The BAF Shelley facility has several operations, including:

- Dehydrated potato granules.
- Formulated dehydrated potato products.
- Dehydrated piece food products.
- Dried potato flakes.
- Animal feed.

Dehydrated potato products

Dehydrated potato products are individual potato cells prepared by cooking and then drying raw potatoes.

Formulated dehydrated potato products

Formulated dehydrated potato products are prepared from various combinations of products, cooked potatoes, and food additives.

Dehydrated Piece Products

The Shelley facility prepares dehydrated whole and piece food products by dehydrating cooked vegetables. The dehydrated piece food products can range up to several inches in diameter.

Animal Feed

Animal feed, consisting of food fractions and off-specification materials that are not suitable for use in other products, is produced as a byproduct of other facility processes. The Shelley facility uses various materials classification processes to segregate, collect, and transport animal feed. Animal feed is transferred directly to loadout operations after collection without further processing.

Production Processes

BAF produces four general types of dehydrated potato products at the Shelley plant: granules, piece products, dried potato formulations, and flakes. To produce these products, potatoes are cooked in water or steam after initial washing and peeling. The cooked potato products then undergo drying.

Materials Transport

Materials transport occurs internally both within a processing activity and externally to transfer materials between processes - to place them into or take them out of bulk storage, or to transport them to packaging and loadout activities. The Shelley facility uses:

- Air suspension systems.
- Belt and bucket conveyors, which are entirely contained within enclosed buildings.
- Wet flumes to transport raw potatoes.

Fuel Types

Natural gas is the only fuel used at the facility.

4.2 FACILITY CLASSIFICATION

The facility is classified as a major facility, in accordance with IDAPA 58.01.01.008.10, for Tier I permitting purposes because the facility emits or has the potential to emit the following pollutants in amounts greater than or equal to 100 T/yr:

- CO - emits at 172.9 T/yr.
- NO_x - emits at 115.7 T/yr.

The facility is also major as defined in IDAPA 58.01.01.006.55; but is not subject to PSD permitting requirements because the facility does not emit or have the potential to emit any regulated air pollutant in amounts greater than or equal to 250 T/yr. The facility is not a designated facility as defined in IDAPA 58.01.01.006.27. The AIRS facility classification is A, and the facility SIC is 2034.

4.3 AREA CLASSIFICATION

The facility is located in Bingham County which is located within AQCR 61. This area is designated unclassified for all federal and state criteria air pollutants. There are no Class I areas within 10 km of the facility.

4.4 PERMITTING HISTORY

On November 20, 1986, Pillsbury was issued a PTC to allow the combustion of liquid fuel in the boilers. Construction was never started on this project; therefore, the PTC expired on November 20, 1988.

On March 20, 1990, Pillsbury received a PTC to allow the construction of Boiler 4, and flake lines 2, 3, and 4 (processes P9-P11).

On December 31, 1998, Pillsbury sold the Shelley facility to BAF. On September 10, 2001, BAF received a PTC transferring ownership from Pillsbury to BAF.

5. REGULATORY ANALYSIS

5.1 FACILITY-WIDE APPLICABLE REQUIREMENTS

5.1.1 Fugitive Particulate Matter - IDAPA 58.01.01.650-651

5.1.1.1 Requirement

Permit Condition 2.1 states that all reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

5.1.1.2 Compliance Demonstration

Permit Condition 2.2 states that the permittee is required to monitor and maintain records of the frequency and the methods used by the facility to reasonably control fugitive particulate emissions. IDAPA 58.01.01.651 gives some examples of ways to reasonably control fugitive emissions which include using water or chemicals, applying dust suppressants, using control equipment, covering trucks, paving roads or parking areas, and removing materials from streets.

Permit Condition 2.3 requires that the permittee maintain a record of all fugitive dust complaints received. In addition, the permittee is required to take appropriate corrective action as expeditiously as practicable after a valid complaint is received. The permittee is also required to maintain records that include the date that each complaint was received and a description of the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

To ensure that the methods being used by the permittee to reasonably control fugitive particulate matter emissions whether or not a complaint is received, Permit Condition 2.4 requires that the permittee conduct periodic inspections of the facility. The permittee is required to inspect potential sources of fugitive emissions during daylight hours and under normal operating conditions. If the permittee determines that the fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee is also required to maintain records of the results of each fugitive emission inspection.

Both Permit Conditions 2.3 and 2.4 require the permittee to take corrective action as expeditiously as practicable. In general, DEQ believes that taking corrective action within 24 hours of receiving a valid complaint or determining that fugitive particulate emissions are not being reasonably controlled meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

5.1.2 Control of Odors - IDAPA 58.01.01.775-776

5.1.2.1 Requirement

Permit Condition 2.5 and IDAPA 58.01.01.776 both state that: *"No person shall allow, suffer, cause or permit the emission of odorous gases, liquids or solids to the atmosphere in such quantities as to cause air pollution."* This condition is currently considered federally enforceable until such time it is removed from the SIP, at which time it will be a state-only enforceable requirement.

5.1.2.2 Compliance Demonstration

Permit Condition 2.6 requires the permittee to maintain records of all odor complaints received. If the complaint has merit, the permittee is required to take appropriate corrective action as expeditiously as practicable. The records are required to contain the date that each complaint was received and a description of the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Permit Condition 2.6 requires the permittee to take corrective action as expeditiously as practicable. In general, DEQ believes that taking corrective action within 24 hours of receiving a valid odor complaint meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

5.1.3 Visible Emissions - IDAPA 58.01.01.625

5.1.3.1 Requirement

IDAPA 58.01.01.625 and Permit Condition 2.7 state that *"(No) person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than twenty percent (20%) opacity as determined . . ."* by IDAPA 58.01.01.625. This provision does not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this rule.

5.1.3.2 Compliance Demonstration

Permit Condition 2.8 requires that the permittee conduct routine visible emissions inspections of the facility to ensure reasonable compliance with the visible emissions rule. The permittee is required to inspect potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection consists of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission covered by this section, the permittee must either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is determined to be greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee must take corrective action and report the exceedance in its annual compliance certification and in accordance with the excess emissions rules in IDAPA 58.01.01.130-136. The permittee is also required to maintain records of the results of each visible emissions inspection and each opacity test when conducted. These records must include the date of each inspection, a description of the permittee's assessment of the conditions existing at the time visible emissions are present, any corrective action taken in response to the visible emissions, and the date corrective action was taken.

It should be noted that if a specific emissions unit has a specific compliance demonstration method for visible emissions that differs from Permit Condition 2.8, then the specific compliance demonstration method overrides the requirement of Permit Condition 2.8. Permit Condition 2.8 is intended for small sources that would generally not have any visible emissions.

Permit Condition 2.8 requires the permittee to take corrective action as expeditiously as practicable. In general, DEQ believes that taking corrective action within 24 hours of discovering visible emissions meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

5.1.4 Excess Emissions

5.1.4.1 Requirement

Permit Condition 2.9 requires that the permittee comply with the requirements of IDAPA 58.01.01.130-136 for startup, shutdown, scheduled maintenance, safety measures, upset, and breakdowns. This section is fairly self-explanatory and no additional detail is necessary in this technical analysis. It should; however, be noted that subsections 133.02, 133.03, 134.04, and 134.05 are not specifically included in the permit as applicable requirements. These provisions of the *Rules* only apply if the permittee anticipates requesting consideration under subsection 131.02 of the *Rules* to allow DEQ to determine if an enforcement action to impose penalties is warranted. Section 131.01 states “. . . *The owner or operator of a facility or emissions unit generating excess emissions shall comply with Sections 131, 132, 133.01, 134.01, 134.02, 134.03, 135, and 136, as applicable. If the owner or operator anticipates requesting consideration under Subsection 131.02, then the owner or operator shall also comply with the applicable provisions of Subsections 133.02, 133.03, 134.04, and 134.05.*” Failure to prepare or file procedures pursuant to sections 133.02 and 134.04 is not a violation of the *Rules* in and of itself, as stated in subsections 133.03.a and 134.06.b. Therefore, since the permittee has the option to follow the procedures in subsections 133.02, 133.03, 134.04, and 134.05; and is not compelled to, the subsections are not considered applicable requirements for the purpose of this permit and are not included as such.

5.1.4.2 Compliance Demonstration

The compliance demonstration is contained within the text of Permit Condition 2.9. No further clarification is necessary here.

5.1.5 Open Burning

All open burning shall be done in accordance with IDAPA 58.01.01.600-616.

5.1.6 Renovation/Demolition – 40 CFR 61, Subpart M (Asbestos)

The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

5.1.7 Chemical Accident Prevention Provisions – 40 CFR 68

Any facility that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, must comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130, or
- The date on which a regulated substance is first present above a threshold quantity in a process.

5.1.8 Test Methods

The test method(s) for each emissions unit limit is listed in the permit in accordance with the EPA's comments as follow below. All testing required by the permit shall be conducted in accordance with the procedures in IDAPA 58.01.01.157.

5.1.9 Reports and Certifications

All periodic reports and certifications required by the permit shall be submitted within 30 days of the end of each specified reporting period to the appropriate DEQ and EPA regional office.

5.1.10 Monitoring and Recordkeeping

The permittee is required to maintain recorded data in an appropriate location for a period of at least five years in accordance with IDAPA 58.01.01.322.07.c. Though specific applicable requirements may have record retention times of less than five years, this requirement requires the permittee to maintain all recorded data for a minimum of five years, which will satisfy those shorter record retention times.

5.1.11 Fuel-burning Equipment

The BAF facility in Shelley operates boilers, product dryers, and space heaters. All fuel-burning equipment combusts natural gas exclusively. The combustion of any other fuel is not permitted.

5.1.12 Fuel-Sulfur Content

The BAF Shelley facility combusts natural gas only. Rules regarding the fuel-sulfur content of liquid fuel do not apply to this facility.

5.1.13 Recycling and Emission Reductions – 40 CFR 82, Subpart F

The purpose of 40 CFR 82, Subpart F is to reduce emissions of Class I and Class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with Section 608 of the Clean Air Act. Subpart F applies to any person servicing, maintaining, or repairing appliances except for motor vehicle emissions. Subpart F also applies to persons disposing of appliances, including motor vehicle air conditioners.

5.2 NSPS – 40 CFR 60

Boiler 5, a 24.5 MMBtu/hr natural gas-fired boiler, was constructed in 2000; therefore, this boiler is subject to the requirements of 40 CFR 60, Subpart Dc. On June 15, 2000, BAF fulfilled the notification requirements of 40 CFR 60.7 and 60.48c. There are no other emissions units in operation at this facility with NSPS-applicable requirements.

5.3 NESHAPS – 40 CFR 61 and 63

The BAF Shelley facility is not currently subject to any provisions of 40 CFR 61 and 63. The BAF facility shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities.

6. REGULATORY ANALYSIS – EMISSIONS UNITS

6.1 BOILERS

6.1.1 Emissions Unit Description

See the description in Permit Condition 3.

6.1.2 Permit Requirements – Boilers 1, 3, 4

The emission limitations and applicable requirement references for Boilers 1, 3, 4 are listed in Table 6.1.2.1.

Table 6.1.2.1 Boilers 1, 3, and 4 Allowable Emissions

Boiler Number	SO ₂		NO _x		CO		PM ₁₀		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
1	0.02	0.09	3.87	16.95	3.25	14.24	0.29	1.29	0.21	0.92
3	0.02	0.09	2.83	12.40	2.38	10.42	0.22	0.96	0.16	0.7
4	0.17	0.74	10.1	44.4	11.2	49.2	0.55	2.4	1.28	5.6

The BAF facility shall only combust natural gas in these boilers.

6.1.3 Compliance Demonstration

The emission limits for each criteria pollutant were derived in the Technical Analysis dated September 4, 2001 for PTC No. 011-00020 dated September 10, 2001. This analysis shows that when Boilers 1, 3, 4 are operating at maximum Btu/hr rating on natural gas, the hourly and annual emission limitations cannot be exceeded; therefore, no monitoring of any process parameter is required. Compliance with opacity shall be determined by the quarterly visible emission observations required by Permit Condition 3.10.

6.1.8 Permit Requirement – Boiler 5

This boiler was installed at the facility in 2000, and can only combust natural gas. Notification of construction was made in accordance with 40 CFR 60.7 and 60.48c in June 2000 to the EPA and DEQ. This boiler is conditionally exempt from new source review by IDAPA 58.01.01.220-223, however IDAPA 58.01.01.676 applies. The requirements of the rule limit particulate emissions to 0.015 gr/dscf corrected to 3% oxygen. Opacity is limited to not greater than 20% opacity aggregating no more than three minutes in any 60-minute period as determined by the methods contained in IDAPA 58.01.01.625.

6.1.9 Compliance Demonstration

Based on the emissions factors for combustion of natural gas for Commercial/Institutional/ Residential Boilers in AP-42, when Boiler 5 is operated per this permit, the particulate emissions rate limit (0.015 gr/dscf at 3% oxygen) cannot be exceeded. Compliance with opacity shall be determined by the quarterly visible emission observations required by Permit Condition 3.10.

6.2 PROCESS A

6.2.1 Emissions Unit Description

See Permit Condition 4. Process dryers that dry material directly - meaning that the combustion gas directly contacts the material - are not subject to IDAPA 58.01.01.675-676. The process dryers for processes A dry material directly; therefore, are not subject to these regulations.

6.2.2 Permit Requirement – Process Weight Limitations

Processes A is subject to process weight limitations found in IDAPA 58.01.01.702. These limitations are based on a material throughput weight measurement. This measurement, in pounds per hour, is input into an equation with the resultant being the maximum particulate emission rate allowable by the process weight rule.

6.2.3 Compliance Demonstration

As shown in the appendix, Process A will not exceed the process weight rate limits at the input rate. Therefore, no throughput monitoring or recordkeeping is required to demonstrate compliance.

6.2.4 Permit Requirement – Opacity

See Permit Condition 4.2.

6.2.5 Compliance Demonstration

See Permit Condition 4.5.

6.3 PROCESS B

6.3.1 Emissions Unit Description

See Permit Condition 5. Process dryers that dry material directly - meaning that the combustion gas directly contacts the material - are not subject to IDAPA 58.01.01.67-676. The process dryer for Process B dries material directly; therefore, is not subject to these regulations.

6.3.2 Permit Requirement – Process Weight Limitations

Process B is subject to process weight limitations found in IDAPA 58.01.01.701. These limitations are based on a material throughput weight measurement. This measurement, in pounds per hour, is input into an equation with the resultant being the maximum particulate emission rate allowable by the process weight rule.

6.3.3 Compliance Demonstration

As shown in the appendix, Process A will not exceed the process weight rate limits at the input rate. Therefore, no throughput monitoring or recordkeeping is required to demonstrate compliance.

6.3.4 Permit Requirement – Opacity

See Permit Condition 5.2.

6.3.5 Compliance Demonstration

See Permit Condition 5.5.

7. INSIGNIFICANT ACTIVITIES

Listed below are the insignificant activities described by the source in accordance with IDAPA 58.01.01.317(b)(i).

Table 7.1 - Insignificant Activities

Description	Insignificant Activities Section Citation
Operation, loading, and unloading of storage tanks and storage vessels, with lids or other appropriate closures and less than 260-gallon capacity, heated only to the minimum extent necessary to avoid solidification.	IDAPA 58.01.01.317.01.B(1)
Operation, loading, and unloading of storage tanks not greater than 1,100 gallon capacity with lids, not containing hazardous air pollutants, and with maximum vapor pressure of 550 mm Hg.	IDAPA 58.01.01.317.01.B(2)
Operation, loading, and unloading of VOC storage tanks, 10,000 gallon capacity or less, with lids or other appropriate closure, and vapor pressure not greater than 80 mm Hg at 21°C.	IDAPA 58.01.01.317.01.B(3)
Operation, loading, unloading, and storage of butane, propane, or liquefied petroleum gas in storage tanks or vessels with less than 40,000 gallon capacity.	IDAPA 58.01.01.317.01.B(4)
Operation, loading, and unloading of gasoline storage tanks, 10,000 gallon capacity or less, with lids or other appropriate closure.	IDAPA 58.01.01.317.01.B(3)

Description	Insignificant Activities Section Citation
Combustion sources, less than 5 MMBtu/hr, exclusively using natural gas, butane, propane, and/or liquefied petroleum gas.	IDAPA 58.01.01.317.01.B(5)
Welding using not more than one ton of rod per day.	IDAPA 58.01.01.317.01.B(9)
"Parylene" coaters using less than 500 gallons of coating per year.	IDAPA 58.01.01.317.01.B(11)
Printing and silk-screening, using less than 2 gallons per day of a combination of inks, coatings, adhesives, fountain solutions, thinners, retarders, or nonaqueous cleaning solutions.	IDAPA 58.01.01.317.01.B(12)
Water cooling towers, not using chromium-based corrosion inhibitors, not using barometric jets or condensers, not greater than 10,000 gallons per minute, and not in direct contact with gaseous or liquid process streams containing regulated air pollutants.	IDAPA 58.01.01.317.01.B(13)
Industrial water chlorination, less than 20 million gallons per day capacity.	IDAPA 58.01.01.317.01.B(16)
Surface coating, using less than 2 gallons per day.	IDAPA 58.01.01.317.01.B(17)
Space heaters and hot water heaters using natural gas, propane, or kerosene, and generating less than 5 MMBtu/hr.	IDAPA 58.01.01.317.01.B(18)
Tanks, vessels and pumping equipment, with lids or other appropriate closure, for storage or dispensing of aqueous solutions of inorganic salts, bases, and acids. Excluding solutions with 99% or greater sulfuric or phosphoric acid; 77% or greater nitric acid; 30% or greater hydrochloric acid; or more than one liquid phase where the top phase is more than 1% VOC.	IDAPA 58.01.01.317.01.B(19)
Equipment, with lids or other appropriate closure, used exclusively to pump, load, unload, or store high-boiling-point organic material, with an initial boiling point not less than 150°C, or vapor pressure not more than 5 mm Hg at 21°C.	IDAPA 58.01.01.317.01.B(20)
Milling and grinding activities (paste forms, if used, are less than 1% VOC).	IDAPA 58.01.01.317.01.B(22)
Rolling, forging, drawing, stamping, shearing, and spinning metals.	IDAPA 58.01.01.317.01.B(23)
Dip-coating operations using materials with less than 1% VOC.	IDAPA 58.01.01.317.01.B(24)
Surface coating, aqueous solution, or suspension containing less than 1% VOC.	IDAPA 58.01.01.317.01.B(25)
Cleaning and stripping activities and equipment, using solutions having less than 1% VOC by weight (no acid cleaning or stripping on metal substrates).	IDAPA 58.01.01.317.01.B(26)
Storage and handling of water-based lubricants for metal working with organic content less than 10%.	IDAPA 58.01.01.317.01.B(27)
Process Stack P1-2	IDAPA 58.01.01.317.01.B(30)
Process Stack P1-3	IDAPA 58.01.01.317.01.B(30)
Process Stack P1-2	IDAPA 58.01.01.317.01.B(30)
Process Stack P2-2	IDAPA 58.01.01.317.01.B(30)
Process Stack P2-3	IDAPA 58.01.01.317.01.B(30)
Process Stack P3-2	IDAPA 58.01.01.317.01.B(30)
Process Stack P3-3	IDAPA 58.01.01.317.01.B(30)
Process Stack P4-2	IDAPA 58.01.01.317.01.B(30)
Process Stack P4-3	IDAPA 58.01.01.317.01.B(30)
Process Stack P5-1	IDAPA 58.01.01.317.01.B(30)
Process Stack P5-2	IDAPA 58.01.01.317.01.B(30)
Pkg-1	IDAPA 58.01.01.317.01.B(30)

Description	Insignificant Activities Section Citation
MT-1	IDAPA 58.01.01.317.01.B(30)
MT-2	IDAPA 58.01.01.317.01.B(30)

8. ALTERNATIVE OPERATING SCENARIOS

No alternate operating scenarios were proposed by BAF for the Shelley facility.

9. TRADING SCENARIOS

No trading scenarios were proposed by BAF for the Shelley facility.

10. COMPLIANCE PLAN

10.1 COMPLIANCE PLAN

Pursuant to the information submitted by Basic American Foods Shelley facility in the June 2001 Tier I operating permit, the Basic American Foods Shelley facility has not obtained PTCs for construction and/or modification of all emission sources at the facility in accordance with IDAPA 58.01.01.200 through 223. The Department and BAF have identified that Process A is not in compliance because permits to construct were not obtained prior to construction or modification.

In addition, the permittee has the continuing responsibility to submit any supplementary information needed, including information for any other sources, in accordance with IDAPA 58.01.01.315.

Because these sources have been constructed and/or modified without a permit, the Department has determined that the most appropriate course of action to bring the facility into compliance with the requirements is to issue a single facility-wide permit that:

- (a) Specifically establishes the operating terms and conditions required by the PTC rules for sources for which a permit was required but not obtained; and
- (b) Collectively addresses the operating terms and conditions required to demonstrate that emissions from all sources at the facility will not contribute to the violation of an applicable standard.

The Department is, therefore, requiring a combined Tier II operating permit (Tier II) and PTC (hereafter referred to as the facility-wide permit). The Tier II for Basic American Foods Shelley facility is required in accordance with IDAPA 58.01.01.401.03 based on the determination that specific emission standards, or requirements on operation or maintenance are necessary to ensure compliance with any applicable emission standard or rule. The facility-wide permit will contain the terms and conditions necessary for the facility to comply with the applicable requirements of IDAPA 58.01.01.400 through 410.

The facility-wide permit will also include all of the terms and conditions for new or modified sources. For those sources within the facility that have existing PTCs, the terms and conditions will be incorporated into the new permit. For sources at the facility for which a PTC was required but not obtained, the permit will establish new emission limits, controls, and other requirements in accordance with the applicable portions of IDAPA 58.01.01.200 through 223. The new facility-wide permit will address all applicable emission standards, required emission control technology, and demonstrate that the facility will not cause or

contribute to any ambient air quality standard or applicable prevention of significant deterioration (PSD) increment.

The combined Tier II and PTC is different than, and separate from, the Tier I in that the new permit will establish new applicable emission limits, controls, and other requirements that are as stringent as the requirements contained in or enforceable under the state implementation plan. This permit will create new underlying requirements for sources that are in existence at the time the initial Tier I is issued. A Tier I permit modification will, therefore, need to be issued concurrently with the issuance of the new facility-wide permit.

The applicable requirements established in the facility-wide permit pursuant to IDAPA 58.01.01.200 through 223 shall be clearly identified as such in the permit and shall remain in full force and effect until such time as they are modified or terminated in accordance with the procedures for issuing a PTC.

The specific compliance schedule elements and milestones to achieve compliance are described below.

Permit Condition 6.2. The permittee will be required to submit a complete permit application with all supporting information and documentation for issuance of a facility-wide permit in accordance with IDAPA 58.01.01.400 through 410 no later than 180 days from the final issuance date of the Tier I. A facility-wide permit is required by the Department to establish the terms and conditions necessary to comply with an applicable rule or standard. The Department shall consider the emissions from all sources at the facility and the specific requirements for individual sources in preparing the facility-wide operating permit.

The permit application shall clearly identify all emissions units at the facility - listing currently permitted emissions units, exempted units for which the facility maintains exemption documentation, units constructed before and not modified since January 24, 1969, and units constructed and/or modified since January 24, 1969 without a permit or construction approval from the Department. Application information shall provide facility information and emissions data for all emissions units in accordance with IDAPA 58.01.01.402 and 403 and shall include a demonstration that the sources at the facility will not cause or significantly contribute to a violation of the NAAQS or of any applicable PSD increment.

The application submittal deadlines have been set to reasonably accommodate updating and organizing the emissions unit descriptions and emissions data, and conducting ambient air quality modeling for all sources. Applications that are deemed or remain incomplete beyond the 180-day milestone shall constitute a violation of this permit condition.

Permit Condition 6.3. In addition to the information submitted under Permit Condition 10.2, the permittee is required to submit all of the information necessary to address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 223 and the NSPS requirements in 40 CFR 60, Subpart KB for the construction and/or modification of sources for which the permittee was required but did not obtain a PTC. The information must include all information to address the additional permit requirements for new major facilities or major modifications where construction without enforceable limits may have triggered PSD or nonattainment new source review (NSR) requirements.

This data must be submitted with the complete permit application required under Permit Condition 6.2 in order to issue a single combined permit. The information is, therefore, due no later than 180 days from the final issuance date of the Tier I. Failure to include complete information for addressing the PTC requirements within the required timeframe shall constitute a violation of this permit condition.

Permit Condition 6.4. If through the development of the facility-wide permit, any other source or sources are identified that should have obtained a PTC or PTC modification and for which the applicant did not include the information under Permit Condition 6.3, a supplemental application that contains all of the information necessary to address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 223 shall be submitted no later than 30 days after receiving written notification from the Department. Supplemental applications that are deemed or remain incomplete beyond the 30-day milestone shall constitute a violation of this permit condition.

Permit Condition 6.5. If the permittee can clearly demonstrate that the data required for the facility-wide permit cannot be collected and organized within the specified timeframe, the permit application submittal deadlines may be extended at the discretion of the Department for a specific time period not to exceed one year. For the Department to consider a request for an extension without jeopardizing the terms and conditions of the permit, the request must be submitted by the facility no later than the midpoint of the compliance milestone timeline. The request must be submitted in writing with a clear demonstration why the data cannot reasonably be submitted within the specified timeframe. An example of information that might justify an extension is the absence of ambient monitoring data required to complete a PSD application.

The Department will review the request and the justification and approve or disapprove the extension in writing. The responsibility for meeting the schedule if the Department has not issued a written extension belongs to the permittee.

Permit Condition 6.6. The Department intends to draft and issue a single facility-wide permit to bring the permittee back into compliance. This permit will fully meet all of the applicable requirements in the *Rules* and the federally approved state implementation plan. Because the permit will contain both elements of PTCs and of Tier II permits, it will clearly identify the origin and basis for each term and condition. The terms and conditions established pursuant to the PTC requirements shall be clearly marked and shall not expire with any Tier II operating permit term. The terms and conditions established pursuant to the Tier II requirements shall be clearly marked and shall be implemented in accordance with the Tier II process. The procedures for issuing a PTC in IDAPA 58.01.01.209 shall be followed concurrently with the procedures for issuing a Tier II in IDAPA 58.01.01.404. The permit shall clearly state that any future modification of a term or condition in the permit shall be subject to the appropriate procedural requirements on which the original term or condition was based.

Permit Condition 6.7. Within 30 days after the Department determines the facility-wide permit application complete, the permittee will need to request a significant permit modification to the Tier I in accordance with IDAPA 58.01.01.382.02. A significant Tier I modification will require the payment of fees in accordance with IDAPA 58.01.01.389.06.b.iii. Because the information in a complete application as required under Permit Condition 6.2 and 6.3 should contain all of the technical information necessary to modify the Tier I, the Department may waive portions of the standard application requirements as appropriate provided the permittee certifies the completeness, truth, and accuracy of all documents submitted.

The Tier I modification shall be processed concurrently with the facility-wide permit in accordance with the procedures for issuing a Tier I in IDAPA 58.01.01.360 through 369.

Permit Condition 6.8. The permittee shall be required to submit a progress report at the end of each calendar quarter (January 1, April 1, July 1, and October 1) of each year stating when each of the conditions of each milestone were or will be achieved. A detailed explanation is required when milestones were not or will not be achieved in accordance with the schedule.

Permit Condition 6.9. The incorporation of the compliance schedule into the Tier I operating permit does not sanction noncompliance with the applicable rules.

11. ACID RAIN PERMIT

The BAF Shelley facility is not subject to the acid rain permitting requirements of 40 CFR 72 through 75. The applicability determination is contained in 40 CFR 72.6(a) and states, "*Each of the following units shall be an affected unit, and any source that includes such a unit shall be an affected source, subject to the requirements of the Acid Rain Program.*" The following definitions of 'unit' and 'fossil fuel' from 40 CFR 72.2 were used to determine that BAF's boilers are not subject to the acid rain program:

'Unit' means a fossil fuel-fired combustion device.

'Fossil fuel' means natural gas, petroleum, coal, or any form of solid, liquid, or gaseous fuel derived from such material.

The facility does not have any requirements to obtain any pollutant allowance from the EPA, nor does it have a pollutant emission limit through these regulations. The substance of the regulation that applies to this facility is the requirement to monitor emissions and report the results.

12. AIRS DATABASE

AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION A - Attainment U - Unclassifiable N - Nonattainment
POLLUTANT							
SO ₂	B		B				U
NO _x	A		A			A	U
CO	A					A	U
PM ₁₀	B						U
PT (Particulate)	B						U
VOC	B						U
THAP (Total HAPs)	B						
			APPLICABLE SUBPART				
			Dc				

AIRS/AFS Classification Codes:

- A Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 ton-per-year (T/yr) threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B Actual and potential emissions below all applicable major source thresholds.
- C Class is unknown.
- ND Major source thresholds are not defined (e.g., radionuclides).

13. REGISTRATION FEES

This facility is a major facility as defined by IDAPA 58.01.01.008.10; therefore, registration and registration fees, in accordance with IDAPA 58.01.01.387, apply.

14. RECOMMENDATION

Based on the Tier I application and review of the federal regulations and state rules, staff recommend that DEQ issue final Tier I operating permit No. 011-00020 to BAF for their facility in Shelley.

SC/sm Project No. T1-9506-076-1 G:\Air Quality\Stationary Source\SS Ltd\T1\BAF Shelley\Final Permit\T1-9506-076-1 Final TM.doc

cc: Rick Elkins, Regional Office
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